OIL CONSER- IN DIVISION

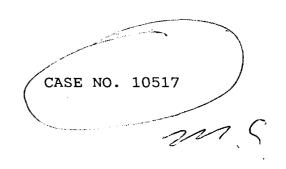
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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SHACKELFORD OIL PROPERTIES, ON BEHALF OF PLAINS RADIO PETROLEUM COMPANY, FOR A UNIT AGREEMENT, CHAVES COUNTY, NEW MEXICO.



PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Shackelford Oil Properties as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Shackelford Oil Properties 114 E. 4th, Suite 105 P.O. Drawer H Roswell, New Mexico 88201 (505) 623-6036

ATTORNEY

W. Thomas Kellahin KELLAHIN, KELLAHIN & AUBREY P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

OPPOSITION OR OTHER PARTY ATTORNEY

Not applicable

STATEMENT OF CASE

APPLICANT

Applicant, in the above-styled cause, seeks approval of the Tomcat Unit Agreement for an area comprising 1960.0 acres, more or less, of State and Federal lands in all or portions of Sections 28, 29, 31, 32 and 33, Township 8 South, Range 31 East, which is approximately 18 miles south by west of Kenna, New Mexico. The applicant further requests that either Plains Radio Petroleum Company or Fred Pool Drilling Inc. be named the initial operator of said unit.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

Phil Moore, geologist 15-20 min. 9 Ex.

Sam Shackelford, landman 10-15 min. 3-4 Ex.

OPPOSITION

WITNESSES EST. TIME EXHIBITS

SEE OPPOSITION FILING

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

P.O. Box 2265 Santa Fe, New Mexico (505) 982-4285

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OIL CONSER. IN DIVISION

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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 10517

APPLICATION OF SHACKELFORD OIL PROPERTIES, ON BEHALF OF PLAINS RADIO PETROLEUM COMPANY, FOR A UNIT AGREEMENT, CHAVES COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Shackelford Oil Properties as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

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W. Thomas Kellahin KELLAHIN, KELLAHIN & AUBREY P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

OPPOSITION OR OTHER PARTY ATTORNEY

Not applicable

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OPPOSITION

WITNESSES EST. TIME EXHIBITS

SEE OPPOSITION FILING

PROCEDURAL MATTERS

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KELLAHIN, KELLAHIN & AUBREY

P.O. Box 2265

Santa Fe, New Mexico (505) 982-4285

phst731.652

OIL CONSER. UN DIVISION

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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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